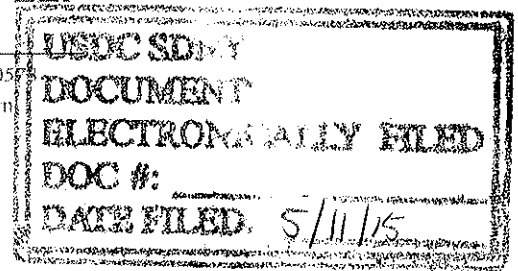


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May 7, 2015



VIA ECF and FEDERAL EXPRESS

Hon. Chief Judge Loretta A. Preska
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Cunningham v. Electronic Data Systems Corp.*, Case No.: 06-CV-03530 (LAP)
Steavens v. Electronic Data Systems Corp., Case No.: 08-CV-10409 (LAP)
Salva v. Hewlett-Packard Co., Case No.: 14-CV-07484-UA (LAP)

Dear Judge Preska:

With co-counsel, we represent Plaintiffs in the three-above captioned lawsuits and I write with the concurrence of Defendants' counsel, Ms. Schreter. The final approval hearing of the settlement of these cases is scheduled for June 8, 2015 and by this letter, the parties request three items of relief in connection with final approval.

The first is to send a supplemental settlement notice to 663 (out of 8,021) settlement class members. These individuals are former Hewlett-Packard employees who had severance agreements pursuant to a Hewlett-Packard Workforce Reduction or Enhanced Early Retirement Plan. Included in the severance agreements were releases of claims, and it has become clear that a number of settlement class members have believed that the severance release prevents them from participating in the settlement here. Without waiving any rights to argue the applicability of these releases in any other proceedings, in order to obviate any confusion, Defendants have agreed to permit the attached supplemental notice to be sent to any of those 663 settlement class members who have not filed consents to the settlement. Inasmuch as the notice period for the settlement here has passed, the parties also believe that an additional claim period time should be provided for these individuals and would request that it be set at 30 days from mailing of the supplemental notice. Accordingly, the parties respectfully request that the Court order the sending of the supplemental notice and extending the claim period for the affected settlement class members for 30 days after the mailing of the supplemental notice. The

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Hon. Loretta A. Preska
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parties further believe that this extension should not require the changing of the final approval hearing, as indeed it is commonplace to have claims periods extend past the final approval hearing in this and other forms of class action settlements.

The second requested item of relief would be to ask the Court's courtesy to permit the extension, from May 13, 2015, to May 20, 2015 for the filing of the papers in support of final approval. Unexpected delays and other commitments for Plaintiffs' counsel underlays this request and, pertinently to this request, it is worth noting that the final approval motion will be entirely uncontested – no objections are being asserted to the settlement or to any part of it. (2)

The third and final requested item of relief is to be able to file a single, consolidated brief in support of (1) the final approval of the settlement, (2) the final certification of the settlement classes; (3) the request for an award of attorneys' fees and costs, (4) the request for incentive awards to the named plaintiffs, and (5) the payment of the claims administrator. The parties requested, and the Court permitted, a single consolidated brief in connection with the preliminary approval hearing, and, here too, rather than filing several separate motions and briefs, the parties believe it most efficacious to have a single memorandum and will undertake to address all relevant matters within fifty pages. (3)

The brief shall be no longer than 25 pages

The parties appreciate Your Honor's attention to and consideration of these requests. The parties are available to answer any inquiries that the Court may have.

SO ORDERED

Loretta A. Preska
 LORETTA A. PRESKA
 UNITED STATES DISTRICT JUDGE

Respectfully submitted,

Seth R. Lesser
 Seth R. Lesser

May 11, 2015

Cc: All counsel of record (via ECF)
 Lisa A. Schreter, Esq. (via email)
 Joshua B. Waxman (via email)

KOL

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Cunningham v. Electronic Data Sys. Corp., Case No. 1:06-cv-03530

Steavens v. Electronic Data Sys. Corp., Case No. 1:08-cv-10409

Salva v. Hewlett-Packard Co., Case No. 1:14-cv-07484 (formerly Case No. 12-cv-06324)

OFFICIAL SUPPLEMENTAL NOTICE
OF SETTLEMENT OF CLASS AND COLLECTIVE ACTION

**To: SETTLEMENT CLASS MEMBERS WHO ARE PARTICIPANTS OF THE HEWLETT PACKARD
WORKFORCE REDUCTION OR ENHANCED EARLY RETIREMENT PLAN**

**Re: Effect of Having Signed A Waiver as Part of the Workforce Reduction or Enhanced Early Retirement Plan
On Participating in the Settlement of this Case**

Date: _____, 2015

As you were previously informed, on November 4, 2014, the Court granted preliminary approval of a proposed settlement ("Settlement") in this case, as set forth in a Stipulation and Settlement Agreement ("Settlement Agreement").

A question has come up as to whether employees who received the notice can participate in the Settlement by returning a claim form if they signed a waiver as part of the HP Workforce Reduction or Enhanced Early Retirement plan.

The answer is yes. HP has agreed that for the limited purpose of participation in this settlement only, it will not enforce any provision of the waiver and release of claims offered to and/or signed by participants of a Workforce Reduction or Enhanced Early Retirement plan to bar participation in this case. As a result, you may participate and submit a claim form in this settlement. In other words, you do not need to opt out of the settlement in this case in order to still be in compliance with the terms of any applicable Workforce Reduction or Enhanced Early Retirement plan.

However, please note that this agreement by HP only applies to your participation in the settlement in this case. HP expressly reserves its right to enforce the waiver and release signed by any Workforce Reduction or Enhanced Early Retirement Participants in any other action or with respect to any other claims.

If this impacts you but you no longer have a copy of the claim form, you can obtain one by calling 1 (855) 382-6440.

**NOTE THAT IF YOU SIGNED A WAIVER AS PART OF THE WORKFORCE REDUCTION OR ENHANCED EARLY
RETIREMENT PLAN THE DEADLINE FOR SUBMITTING YOUR CLAIM FORM HAS BEEN EXTENDED TO [30 DAYS
FOLLOWING MAILING OF NOTICE]**

Completed Claim Form Packages must be mailed to:

Cunningham v. EDS/Salva v. HP Settlement
c/o GCG, Claims Administrator
P. O. Box 35084
Seattle, WA 98124-3508
(855) 382-6440

Should you submit the Claim Form Package, please follow the directions on the Claim Form Package carefully. If you require assistance, you may contact the Claims Administrator.

**Do Not Call or Write the Court or Office of the Clerk to Obtain Copies of the Claim Form Package, to Ask
Questions About the Settlement, or to Ask Questions about the Claims Process.**